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To Bonita Lavelle/EPR/R8/USEPA/US@EPA

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Subject OU 3 draft Phase I SAP

History:

This message has been forwarded.

Bonnie.

ADMINISTRATIVE RECORD

Thank you for the opportunity to review the SAP. MWH provided a very thorough review and I don't disagree with most of the comments. After our conversations, the meetings and calls leading up to this document, I understand and trust the intention of the sampling event. It is very difficult to write a plan for such an endeavor.

Just a few additional thoughts:

- 1. It appears that Section 4.5.3 has been skipped. Possible simple mis-numbering issue.
- 2. I didn't read every detail but was curious as to where Attachment B is referenced in the text as the DQO's did not include a discussion of benchmarks and screening levels.
- 3. Also, I would suppose that there will be more detail justification as to the selection of screening levels in the Series of Tables from Section 6 (Region 3 vs 9) and a clear understanding that Montana's surface water standards are based on total recoverable not dissolved metals.
- 4. I think there may need to be a little more clarity on how we are going to use this data to determine the Phase II study area, of course without saying we'll know it when we see it!

I know we have plenty of opportunity to get this focused for Phase II and I do support that this document will suffice for Phase I. Congratulations on getting this going this year – great accomplishment and collaborative effort.

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